

**SIDLEY**

**JENNER & BLOCK** LLP

March 26, 2019

The Honorable Ann M. Donnelly  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Chambers N 415  
Brooklyn, NY 11201

**Re: *United States v. Huawei Technologies Co., Ltd., et al.*, 18 CR 457 (S-2)(AMD);  
Unopposed Request for Extension of Time to File Motion for Bill of Particulars**

Dear Judge Donnelly:

We represent defendants Huawei Technologies Co., Ltd. and Huawei Device USA Inc. (collectively, the “Huawei Defendants”) in the above-referenced matter. On behalf of the Huawei Defendants, we respectfully seek an extension of time by which to file a motion for a bill of particulars. The government does not oppose this request.

Under Rule 7 of the Federal Rules of Criminal Procedure, a defendant “may move for a bill of particulars before or within 14 days after arraignment or at a later time if the court permits.” Fed. R. Crim. P. 7(f). The Huawei Defendants were arraigned before the Honorable Ramon E. Reyes, United States Magistrate Judge, on March 14, 2019. Thus, absent extension, a motion for a bill of particulars would be due March 28, 2019.

Earlier today, undersigned counsel served a letter on the government requesting discovery. The government has informed us that it is preparing a proposed protective order governing discovery in the case. Because the scope of discovery provided by the government may affect the need for or scope of any motion for a bill of particulars, the Huawei Defendants respectfully request that the Court continue the time for filing a bill of particulars until a later date.

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Respectfully submitted,

/s/ Michael A. Levy

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